

1 James Patrick Shea, Esq.
2 Nevada Bar No. 405
3 Bart K. Larsen, Esq.
4 Nevada Bar No. 8538
5 Kyle M. Wyant, Esq.
6 Nevada Bar No. 14652
7 **SHEA LARSEN**
8 1731 Village Center Circle, Suite 150
9 Las Vegas, Nevada 89134
10 Telephone: (702) 471-7432
11 Fax: (702) 926-9683
12 Email: jshea@shea.law
13 blarsen@shea.law
14 kwyant@shea.law

15 -and-

16 **MORRISON & FOERSTER LLP**
17 Gary Lee, Esq. (*Admitted Pro Hac Vice*)
18 New York Bar No. 2397669
19 Andrew Kissner, Esq. (*Admitted Pro Hac Vice*)
20 New York Bar No. 5507652
21 250 West 55th Street
22 New York, New York 10019-3601
23 Telephone: 212.468.8000
24 Facsimile: 212.468.7900
25 Email: glee@mofo.com
26 akissner@mofo.com

27 *Attorneys for Enigma Securities Limited*

28 **UNITED STATES BANKRUPTCY COURT**

1 **FOR THE DISTRICT OF NEVADA**

2 IN RE:

3 Case No.: BK-23-10423-MKN

4 CASH CLOUD INC.,
5 dba COIN CLOUD,

6 Chapter 11

7 Debtor.

8 ECF Nos. 311, 355, 358, 361, 364

9 Continued Hearing Date: May 25, 2023
10 Continued Hearing Time: 2:00 p.m. (PT)

11 **SUPPLEMENT TO ENIGMA SECURITIES LIMITED'S OMNIBUS OBJECTION TO**
12 **DEBTORS' MOTIONS TO APPROVE REJECTION OF EXECUTORY CONTRACTS**
13 **AND UNEXPIRED LEASES**

14 Per the Court's instructions and the discussions of counsel at the May 18, 2023 hearing on
15 Enigma Securities Limited ("Enigma") objection (the "Objection") and the (i) *Debtor's Fourth*
16 *Omnibus Motion for Entry of Order Approving Rejection of Executory Contracts and Unexpired*

SHEA LARSEN
1731 Village Center Circle, Suite 150
Las Vegas, Nevada 89134
(702) 471-7432

1 *Leases Pursuant to 11 U.S.C. § 365(a) and Disposal of Certain Personal Property Including*
 2 *Surrender and Termination of the Automatic Stay and/or Abandonment* [ECF No. 355] (the
 3 *“Fourth Rejection Motion”*), (ii) *Debtor’s Fifth Omnibus Motion for Entry of Order Approving*
 4 *Rejection of Executory Contracts and Unexpired Leases Pursuant to 11 U.S.C. § 365(a) and*
 5 *Disposal of Certain Personal Property Including Surrender and Termination of the Automatic Stay*
 6 *and/or Abandonment* [ECF No. 358] (the *“Fifth Rejection Motion”*), (iii) *Debtor’s Sixth Omnibus*
 7 *Motion for Entry of Order Approving Rejection of Executory Contracts and Unexpired Leases*
 8 *Pursuant to 11 U.S.C. § 365(a) and Disposal of Certain Personal Property Including Surrender*
 9 *and Termination of the Automatic Stay and/or Abandonment* [ECF No. 361] (the *“Sixth Rejection*
 10 *Motion”*), and (iv) *Debtor’s Seventh Omnibus Motion for Entry of Order Approving Rejection of*
 11 *Executory Contracts and Unexpired Leases Pursuant to 11 U.S.C. § 365(a) and Disposal of*
 12 *Certain Personal Property Including Surrender and Termination of the Automatic Stay and/or*
 13 *Abandonment* [ECF No. 364] (the *“Seventh Rejection Motion”* and, collectively with the Fourth
 14 Rejection Motion, the Fifth Rejection Motion, and the Sixth Rejection Motion, the *“Motions”*)
 15 filed by Cash Cloud Inc. (hereinafter, the *“Debtor”* or *“Coin Cloud”*), Enigma is providing the
 16 written discovery propounded by Enigma as **Exhibit 1** hereto in order to ensure a complete and
 17 accurate record for the continued hearing scheduled for May 25, 2023 at 2:00 p.m.

18 Dated this 25th day of May, 2023.

19 By /s/ James Patrick Shea

20 James Patrick Shea, Esq.
 21 Nevada Bar No. 405
SHEA LARSEN

22 -and-

23 Gary Lee, Esq. (*Admitted Pro Hac Vice*)
 24 New York Bar No. 2397669
 Andrew Kissner, Esq. (*Admitted Pro Hac Vice*)
 New York Bar No. 5507652
MORRISON & FOERSTER LLP

25
 26 *Attorneys for Creditor*
 27 *Enigma Securities Limited*

SHEA LARSEN
 1731 Village Center Circle, Suite 150
 Las Vegas, Nevada 89134
 (702) 471-7432

CERTIFICATE OF SERVICE

1. On May 25, 2023, I served **SUPPLEMENT TO ENIGMA SECURITIES LIMITED'S OMNIBUS OBJECTION TO DEBTORS' MOTIONS TO APPROVE REJECTION OF EXECUTORY CONTRACTS** in the following manner:

a. ECF System: Under Administrative Order 02-1 (Rev. 8-31-04) of the United States Bankruptcy Court for the District of Nevada, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by the Court's facilities.

- b. United States mail, postage fully prepaid:
- c. Personal Service:

I personally delivered the document(s) to the persons at these addresses:

For a party represented by an attorney, delivery was made by handing the document(s) at the attorney's office with a clerk or other person in charge, or if no one is in charge by leaving the document(s) in a conspicuous place in the office.

For a party, delivery was made by handing the document(s) to the party or by leaving the document(s) at the person's dwelling house or usual place of abode with someone of suitable age and discretion residing there.

d. By direct email (as opposed to through the ECF System):
Based upon the written agreement of the parties to accept service by email or a court order, I caused the document(s) to be sent to the persons at the email addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

e. By fax transmission:

Based upon the written agreement of the parties to accept service by fax transmission or a court order, I faxed the document(s) to the persons at the fax numbers listed below. No error was reported by the fax machine that I used. A copy of the record of the fax transmission is attached.

f. By messenger:

I served the document(s) by placing them in an envelope or package addressed to the persons at the addresses listed below and providing them to a messenger for service.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 25, 2023

By: /s/ Bart K. Larsen, Esq.

EXHIBIT 1

1 James Patrick Shea, Esq.
2 Nevada Bar No. 405
3 Bart K. Larsen, Esq.
4 Nevada Bar No. 8538
5 Kyle M. Wyant, Esq.
6 Nevada Bar No. 14652
7 **SHEA LARSEN**
8 1731 Village Center Circle, Suite 150
9 Las Vegas, Nevada 89134
10 Telephone: (702) 471-7432
11 Fax: (702) 926-9683
12 Email: jshea@shea.law
13 blarsen@shea.law
14 kwyant@shea.law

15 -and-
16

17 **MORRISON & FOERSTER LLP**
18 Gary Lee, Esq. (*Admitted Pro Hac Vice*)
19 New York Bar No. 2397669
20 Andrew Kissner, Esq. (*Admitted Pro Hac Vice*)
21 New York Bar No. 5507652
22 250 West 55th Street
23 New York, New York 10019-3601
24 Telephone: 212.468.8000
25 Facsimile: 212.468.7900
Email: glee@mofo.com
akissner@mofo.com

26 *Attorneys for Enigma Securities Limited*

27 **UNITED STATES BANKRUPTCY COURT**

28 **FOR THE DISTRICT OF NEVADA**

29 IN RE:

30 Case No.: BK-23-10423-MKN

31 CASH CLOUD INC.,
32 dba COIN CLOUD,

33 Chapter 11

34 ECF Nos. 311, 355, 358, 361, 364, 549, 550,
35 571

36 Debtor.

37 **ENIGMA SECURITIES LIMITED'S INTERROGATORIES TO TANNER JAMES**

Enigma Securities Limited (“Enigma”), by and through its undersigned counsel, hereby submits the following interrogatories to Tanner James (“you” or “your”) of Province, LLC (“Province”). Pursuant to the Court’s direction given at the May 18, 2023 hearing in the above-captioned case, you shall provide written answers under oath to the following questions to the undersigned counsel by no later than 5:00 p.m. (PT) on May 23, 2023. Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the pending motions to reject certain leases and abandon associated collateral [ECF Nos. 355, 358, 361, 364] (collectively, the “Motions”) and your declaration [ECF No. 550] (the “Declaration”) and supplemental declaration [ECF No. 571] (the “Supplemental Declaration”) submitted in connection therewith.

INTERROGATORIES

1. Describe in detail your involvement with “the sale of the Debtor’s assets” (Declaration, ¶ 3), including but not limited to the number of potentially interested parties that you have personally spoken or communicated with in connection with a prospective sale or other transaction with respect to the Debtor or its assets (such parties, “Prospective Buyers,” and such sale or other transaction, a “Transaction”).

2. With how many Prospective Buyers have you discussed (or otherwise communicated regarding) the quantity of the Debtor's Leases, Contracts, or Kiosks that such Prospective Buyer might wish to purchase?

3. When is the current deadline to submit a bid for a prospective Transaction?

4. When is the Auction currently scheduled to occur?

5. Do you, Province, or the Debtor (as applicable) intend to consummate only a single Transaction, or is it possible that more than one Transaction will be consummated?

6. How many parties have submitted bids in connection with a prospective Transaction as of the date hereof (whether a definitive bid, bid to act as "stalking horse," indication of interest, or otherwise)?

7. How many “potential buyers” have requested that “the Debtor’s locations be reduced in number” as of the date hereof? Declaration, ¶ 6.

1 8. Describe in detail the basis for your conclusion that “rejection of the Contracts and
2 Leases set forth in the Motions will [not] depress the sale price of the Debtor’s assets.” Declaration,
3 ¶ 6.

4 9. Describe any offers or indications of interest you, Province, or the Debtor (as
5 applicable) have received for a Transaction with respect to the sale, liquidation, or operation of the
6 Kiosks subject to the Motions.

7 10. Describe in detail the basis for your personal knowledge of the purported facts and
8 conclusions set forth in paragraphs 8 and 9 of your Supplemental Declaration.

9 11. To your knowledge, did you, Province, or the Debtor (as applicable) permit
10 RockItCoin to contact the “contract parties” described in paragraphs 7 and 8 of your Supplemental
11 Declaration?

12 12. What is your understanding as to why RockItCoin wished to contact the “contract
13 parties” described in paragraphs 7 and 8 of your Supplemental Declaration?

14 //

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

